



August 28, 2022


**BY ECF**

Honorable Ronnie Abrams  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Application granted. The sentence is  
adjourned to October 18, 2022 at 11:30 a.m.

SO ORDERED.

Re: *United States v. Cesar Cruz Vargas*, 1:19-cr-00635-RA

  
\_\_\_\_\_  
Ronnie Abrams, U.S.D.J.  
August 29, 2022

Dear Judge Abrams:

On June 24, 2022, the Court appointed the undersigned as CJA counsel for Cesar Cruz Vargas. Sentencing in this matter is scheduled for September 13, 2022. We write to respectfully request that the Court adjourn sentencing until mid-October. The government has no objection.

We recognize that Mr. Cruz Vargas' case has been pending for some time. We have met with Mr. Cruz Vargas multiple times in Westchester since our appointment and, without disclosing the specific content of those meetings, Mr. Cruz Vargas has expressed to us sincere concerns about his case. Unfortunately, our interactions with Mr. Cruz Vargas have at times been difficult. As a result of those conversations, we have reviewed the record in this matter and spoken to his prior counsel in an effort to assuage his concerns. However, Mr. Cruz Vargas remains focused on these issues and has not engaged in our efforts to work with him on sentencing issues. Accordingly, we respectfully request this additional time to continue to attempt to work through Mr. Cruz Vargas' issues so that they will not further distract from sentencing. We understand that Mr. Cruz Vargas is now on his third set of CJA attorneys and that the Court has already afforded him generous leeway. We thank the Court for its consideration of this request.

Sincerely,

/s/ John T. Zach  
**John T. Zach**  
**Waleska Suero Garcia**  
*Attorneys for Cesar Cruz Vargas*

**Copy to:**

U.S. Attorney's Office, SDNY, via ECF